

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

=====	:	
AUCTUS FUND, LLC,	:	
Plaintiff,	:	
v.	:	
VERUS INTERNATIONAL, INC. f/k/a	:	<b><u>Civil Action No. 1:19-cv-10641-WGY</u></b>
REALBIZ MEDIA GROUP, INC.,	:	
Defendant.	:	
=====	:	

**MOTION TO WITHDRAW**

The undersigned, Thomas A. Bockhorst, Esq., respectfully moves this Honorable Court to withdraw his appearance and that of his Firm from the above-captioned action. In support hereof, the undersigned states that serious irreconcilable differences exist between the undersigned and the Plaintiff, which require the withdrawal of the undersigned and his Firm from further representation in this action.

Respectfully Submitted,

/s/ Thomas A. Bockhorst  
Thomas A. Bockhorst, Esq. (BBO #564082)  
Giordano & Company, P.C.  
REED & GIORDANO, P.A.  
47 Winter Street, Suite 800  
Boston, Massachusetts 02108-4774  
Telephone: (617) 723-7755  
Facsimile: (617) 723-7756  
Email: tbockhorst@reedgiordano.com

Dated: November 29, 2021

**CERTIFICATE OF SERVICE**

I, Philip M. Giordano, do hereby certify that, on this 29<sup>th</sup> day of November, 2021, that I caused to be served a true copy of attached Motion to Withdraw, by email as follows: as filed by and through the District Court's electronic filing/ECF system and that such true copy is available for downloading and viewing by all parties or counsel of record and by emailing a true copy as follows:

Auctus Fund, LLC  
545 Boylston Street, Suite 200  
Boston, Massachusetts 02116  
Attn: Alfred Sollami, Managing Member  
Email: als@auctusfundllc.com  
Louis Posner, Manager  
Email: louposner@auctusfundllc.com

Dated: November 29, 2021

/s/ Philip M. Giordano  
Philip M. Giordano